

# **EXHIBIT F**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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ROVER PIPELINE LLC,

Case No. 2:17-cv-10365

Plaintiff,

Hon. Mark A. Goldsmith

v.

Mag. Judge Mona K. Majzoub

1.23 ACRES OF LAND, MORE OR  
LESS, PERMANENT EASEMENT  
(PIPELINE RIGHT-OF-WAY  
SERVITUDE), AND 3.74 ACRES OF  
LAND, MORE OR LESS,  
TEMPORARY WORK SPACE, IN  
LENAWEE COUNTY, MICHIGAN,  
Office of the Lenawee County Drain  
Commissioner  
Tract No. MI-LE-004.000,  
AND UNKNOWN OWNERS, et al.,

**PLAINTIFF'S EXPERT WITNESS  
DISCLOSURES PURSUANT TO  
FED. R. CIV. P. 26(a)(2)**

Defendants.

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John M. DeVries (P12732)  
Douglas A. Donnell (P33187)  
William A. Horn (P33855)  
Nikole L. Canute (P68713)  
Mika Meyers PLC  
Counsel for Plaintiff  
900 Monroe Avenue, NW  
Grand Rapids, MI 49503  
(616) 632-8000  
jdevries@mikameyers.com  
ddonnell@mikameyers.com  
whorn@mikameyers.com  
ncanute@mikameyers.com

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Thomas A. Zabel  
Zabel Freeman  
Co-Counsel for Plaintiff  
1135 Heights Boulevard  
Houston, TX 77008  
(713) 802-9117  
tzabel@zflawfirm.com

Plaintiff, Rover Pipeline LLC (“Rover”), provides its expert witness disclosures pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure:

1. Anthony Sanna, MAI, CRE, FRICS  
Senior Managing Director  
Integra Realty Resources – Detroit

c/o **Mika Meyers PLC**  
900 Monroe Avenue NW  
Grand Rapids, MI 49503  
(616) 632-8000

Mr. Sanna, a certified general real estate appraiser, will testify as one of Rover’s experts on the just compensation owing to Defendants as a result of Rover’s taking of the easements forming the basis of this lawsuit.

2. Constantino G. Naoum  
Integra Realty Resources – Detroit

c/o **Mika Meyers PLC**  
900 Monroe Avenue NW  
Grand Rapids, MI 49503  
(616) 632-8000

Mr. Naoum, a certified general real estate appraiser, may testify as one of Rover’s experts on the just compensation owing to Defendants as a result of Rover’s taking of the easements forming the basis of this lawsuit.

3. Thomas H. Chuba  
Integra Realty Resources – Detroit

c/o **Mika Meyers PLC**

900 Monroe Avenue NW  
Grand Rapids, MI 49503  
(616) 632-8000

Mr. Chuba, a certified general real estate appraiser, may testify as one of Rover's experts on the just compensation owing to Defendants as a result of Rover's taking of the easements forming the basis of this lawsuit.

4. Mark A. Williams  
Value Midwest

c/o **Mika Meyers PLC**  
900 Monroe Avenue NW  
Grand Rapids, MI 49503  
(616) 632-8000

Mr. Williams, a certified general real estate appraiser and an agricultural appraiser, will testify on the just compensation owing to Defendants who have claimed agricultural/crop damages as a result of Rover's taking of the easements forming the basis of this lawsuit.

5. Glen D. Tolksdorf  
Aspen Appraisals

c/o **Mika Meyers PLC**  
900 Monroe Avenue NW  
Grand Rapids, MI 49503  
(616) 632-8000

Mr. Tolksdorf, a certified general real estate appraiser and a Michigan registered forester, will testify on the just compensation owing to Defendants who

have claimed damages related to loss of timber and/or mineable gravel as a result of Rover's taking of the easements forming the basis of this lawsuit.

6. Gary C. Pavlis, Ph.D.  
Rutgers Cooperative Extension Office

c/o **Mika Meyers PLC**  
900 Monroe Avenue NW  
Grand Rapids, MI 49503  
(616) 632-8000

Dr. Pavlis, a professor and agricultural agent at Rutgers University with expertise in blueberry production, will testify regarding blueberry production, the life expectancy of blueberry bushes, and his observations and opinions related to the blueberry bushes located upon the property referred to in this litigation as MI-WA-099.000.

7. Tommy D. Overton, Jr.  
Tommy D. Overton, Jr., P.E.

c/o **Mika Meyers PLC**  
900 Monroe Avenue NW  
Grand Rapids, MI 49503  
(616) 632-8000

If necessary, Mr. Overton will testify as a rebuttal witness regarding pipeline construction, pipeline safety, his observations of the Rover Pipeline, and other matters within his expertise.

8. Richard D. Huriaux, P.E.  
Richard D. Huriaux, P.E. LLC

c/o **Mika Meyers PLC**  
900 Monroe Avenue NW  
Grand Rapids, MI 49503  
(616) 632-8000

If necessary, Mr. Huriaux, a former Director of Pipeline Technical Standards and Director of Pipeline Regulations & Technical Standards for the Office of Pipeline Safety, Pipeline and Hazardous Materials Safety Administration (PHMSA), U.S. Department of Transportation, will testify as a rebuttal witness regarding pipeline construction standards, pipeline regulations, PHMSA standards, and other matters within his expertise.

9. Mike Israni  
Inamco Engineering, LLC

c/o **Mika Meyers PLC**  
900 Monroe Avenue NW  
Grand Rapids, MI 49503  
(616) 632-8000

If necessary, Mr. Israni, a former Senior Technical Advisor & Manager – Regulations and Standards with the Office of Pipeline and Hazardous Materials Safety Administration (PHMSA), U.S. Department of Transportation, will testify as a rebuttal witness regarding pipeline construction standards, pipeline regulatory safety, PHMSA standards, and other matters within his expertise.

10. Expert witnesses necessary to rebut claims asserted by Defendants' witnesses.

The qualifications of all of the above-listed individuals are attached hereto.

Rover reserves its right to supplement and modify these witness disclosures to the extent allowed by the Court and the applicable rules.

Respectfully submitted this 29th day of September, 2017,

MIKA MEYERS <sup>PLC</sup>  
Co-Counsel for Plaintiff

By: /s/John M. DeVries  
John M. DeVries (P12732)  
900 Monroe Avenue, NW  
Grand Rapids, MI 49503  
(616) 632-8000  
jdevries@mikameyers.com

**LOCAL RULE CERTIFICATION**

I, John M. DeVries, certify that this document complies with Local Rule 5.1(a), including: double-spaced (except for quoted materials and footnotes); at least one-inch margins on the top, sides, and bottom; consecutive page numbering; and type size of all text and footnotes that is no smaller than 10-1/2 characters per inch (for non-proportional fonts) or 14 point (for proportional fonts). I also certify that it is the appropriate length. Local Rule 7.1(d)(3).

/s/John M. DeVries



## Anthony Sanna, MAI, CRE, FRICS

### Experience

Senior Managing Director with Integra Realty Resources – Detroit. With over 20 years of real estate valuation and consulting experience in the Metro Detroit area, he is actively engaged in a wide range of commercial, industrial and vacant land assignments. The firm completed an extensive list of large scale assignments including major regional malls, numerous Class A office buildings and large scale manufacturing facilities. Special purpose properties include a wide range of properties such as golf courses, self-storage facilities, movie theatres, military bases, hotels, and marinas. Most recently, appraisals have been provided to financial institutions in relation to loan work outs, asset disposition and foreclosure proceedings.

Mr. Sanna has recognized experience in tax appeals, condemnation and litigation oriented appraisals. Additionally, he provides corporate clients and institutional investors an array of real estate consulting services on all classes of property.

Clients served include life insurance companies, pension funds and pension fund advisors, banks and financial institutions, conduits, developers and investors, law firms, hospitals, corporations and government.

### Professional Activities & Affiliations

Appraisal Institute, Member (MAI)  
Counselor of Real Estate (CRE)  
Royal Institute of Chartered Surveyors, Fellow (FRICS)  
Board of Director: Integra Realty Resources - 2005-2008 and 2010-present  
Board of Director: Commercial Board of Real Estate - Michigan Chapter

### Licenses

Michigan, Appraiser, 1201001324, Expires July 2019

### Education

Bachelor of Science (Business Administration) Wayne State University

Appraisal Institute Courses:

- Principals of Real Estate Appraisal
- Procedures of Real Estate Appraisal
- Uniform Standards of Professional Practice
- Basic Income Capitalization
- Advanced Income Capitalization
- Report Writing
- Advanced Applications/Case Studies

### Qualified Before Courts & Administrative Bodies

Qualified expert witness before the Michigan Tax Tribunal, various Circuit Courts, planning boards, commissioner hearings and County Tax Boards.

#### Integra Realty Resources Detroit

400 West Maple  
Suite 100  
Birmingham, MI 48009

T 248.540.0040  
F 248.540.8239

irr.com



## Constantino G Naoum

### Experience

Integra Realty Resources - Detroit (formerly Dean Appraisal) Appraiser employed since 1995, preparing commercial appraisals, market area descriptions, comparable data summaries, absorption studies and demographic analysis for income producing properties. Valuations have been performed on various properties including, but not limited to, single-family development, attached condominium developments, industrial buildings, office buildings, neighborhood strip-centers and vacant land for various uses.

Clients served include lending institutions, investment firms, accountants, law firms, private and public agencies. Valuations have been performed for financing, estates, equity participation, and consulting/marketing purposes. Valuations and market studies have been completed for proposed, partially completed, renovated and existing structures.

### Professional Activities & Affiliations

Appraisal Institute: Associate Member

### Licenses

Michigan, State Certified General Real Estate Appraiser, 1201068135, Expires July 2019

### Education

Bachelor of Science in Business Administration, Major-Finance  
Masters of Business Administration, Major-Finance  
Wayne State University, Detroit, Michigan

Successfully completed numerous real estate related courses and seminars sponsored by the Appraisal Institute, including:

110 Real Estate Appraisal Principles  
120 Real Estate Appraisal Procedures  
310 Basic Income Capitalization  
320 General Applications  
410 USPAP A  
420 USPAP B  
510 Advanced Income Capitalization  
520 Highest and Best Use  
530 Advanced Sales Comparison and Cost Approaches

#### Integra Realty Resources Detroit

400 West Maple  
Suite 100  
Birmingham, MI 48009

T 248-540-0040  
F 248-540-8239

irr.com



## Thomas H. Chuba

### Experience

Employed as a full time Senior Analyst with Integra Realty Resources – Detroit (formerly Dean Appraisal Company) since 1988. Responsibilities include the preparation of commercial real estate appraisals, market analyses, market area descriptions, absorption studies, and demographic analyses for income producing properties.

Appraisal assignments have included various properties such as industrial buildings, office buildings, shopping centers, marinas, restaurants, churches, vacant development land, recreational areas, and other various income producing properties. Valuations and market analyses have been prepared for existing, proposed, partially completed, and renovated structures.

Valuations have been performed for various purposes such as financing, eminent domain proceedings, estate settlement, ad valorem, litigation, portfolio management, and other various disposition purposes.

Clients served include lending institutions, accountants, law firms, investment firms, the Michigan Department of Transportation, and other various public and private agencies.

### Professional Activities & Affiliations

Appraisal Institute: Associate Member

### Licenses

Michigan, State Certified General Real Estate Appraiser, 1201001314, Expires July 2019

### Education

Bachelor of Science, Insurance and Real Estate, Ferris State University, Big Rapids, Michigan.

Successfully completed numerous real estate related courses and seminars sponsored by the Appraisal Institute, including:

- 1A-1 Real Estate Appraisal Principles
- 1A-2 Basic Valuation Procedures
- 1B-A Capitalization Theory and Techniques - Part A
- 1B-B Capitalization Theory and Techniques - Part B
- 2-1 Case Studies in Real Estate Valuation
- II 540 Report Writing Valuation and Analysis
- 410 Standards of Professional Practice - Part A
- 420 Standards of Professional Practice - Part B
- 430 Standards of Professional Practice - Part C

#### Integra Realty Resources Detroit

400 West Maple  
Suite 100  
Birmingham, MI 48009

T 248-540-0040  
F 248-540-8239

irr.com



## *Qualifications*

### MARK A. WILLIAMS

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VALUE MIDWEST | 6446 MORRIS STREET - PO BOX 125 | MARLETTE, MI 48453-0125  
EMAIL: [MARK@VALUEMIDWEST.COM](mailto:MARK@VALUEMIDWEST.COM) | CELL: 810.252.6938 | OFFICE: 989.635.0086 | FAX: 866.860.7904

#### **EXPERIENCE**

2003-Present	<b>President/Certified General Appraiser</b> Value Midwest Marlette, Michigan
1994-2003	<b>President/Certified General Appraiser</b> Agricultural Advisors Ltd. North Branch, Michigan
1992-1994	<b>Associate Appraiser</b> Hodge Appraisal Group Ltd. Lapeer, Michigan
1987-1988	<b>Agricultural Financial Consultant</b> Gardner & Associates Port Huron, Michigan

#### **EDUCATION**

1971-1974	<b>Central Michigan University</b> B.A. - Journalism/Public Relations Mt. Pleasant, Michigan
1990-1991	<b>Eastern Michigan University</b> Post Graduate Studies Ypsilanti, Michigan

#### **LICENSES HELD**

Certified General Appraiser – Michigan - #1201003316  
Certified General Appraiser – Indiana - #CG41100033  
Certified General Real Estate Appraiser – Ohio - #2012002810  
Certified General Real Estate Appraiser – Texas - #TX 1380074 G  
Certified General Real Property Appraiser – Iowa - #CG03131  
Certified General Real Property Appraiser – Nebraska - #CG290109R  
Certified General Appraiser – Colorado - #CG100035633  
Certified General Appraiser – North Dakota - #CG-21512  
Certified General Appraiser – Montana - #REA-RAG-LIC-7206  
Certified General Appraiser – South Dakota - #1363CG  
Certified General Appraiser- Minnesota- #40382980

## MARK A. WILLIAMS

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### **APPRAISAL COURSES COMPLETED**

Holloway Real Estate Institute  
American Society of Farm Managers and Rural Appraisers

Northern Michigan University  
American Society of Appraisers

<b><u>Year</u></b>	<b><u>Course Title</u></b>
1992	Real Estate Appraisal "One"
	Uniform Standards of Professional Appraisal Practice
	Fundamentals of Rural Appraisal Challenge
1993	Principles of Rural Appraisal
1994	Advanced Rural Appraisal
	Special Purpose Structures Seminar
	Appraising Multi-Family Units
1995	Permanent Plantings Seminar
1997	Surveying and Legal Descriptions
1999	Appraisal Report Writing
2001	Conservation Easements Seminar
	Environmental Due Diligence
2002	Uniform Agricultural Appraisal Report
	Income Capitalization (Part I)
2003	UAAR Seminar – 2 Day
	2004-2005 National USPAP Update
	Real Estate Institute "One"
2004	Property Management and Managing Risk
	Appraising the Oddball: Nonconforming & Difficult Properties
	Michigan Appraisal Law
	Legal Update
2006	Eminent Domain
	Yellow Book (UASFLA)
	Appraisal Review Under UASFLA (A-380)
2007	Introduction to Appraisal Review
	Appraisal Review Under USPAP
2008	Michigan Law (for recertification)
	2008-2009 National USPAP Update
	Advanced Approaches to Value for Rural Appraisal (A-300)
2009	Advanced Appraisal Review Case Studies (A-390)
	Valuation of Cons. Ease. & Other Partial Interests in RE
2010	ASFMRA Instructor Workshop
	Expert Witness Preparation and Testimony
	2010-2011 National USPAP Update
2011	Instructing Basic Appraisal Procedures (A-102)
	2012-2013 National USPAP Update
2012	Report Writing
	Land and Site Valuation
	Michigan Appraisal Law
	Using Your HP12C Financial Calculator
	Michigan Code of Ethics
	Michigan Agency Law
2013	Permanent Plantings
	Key Issues of Grain Elevator Valuation
	Introduction to Commercial Greenhouse Appraisal

## MARK A. WILLIAMS

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### **APPRAISAL COURSES COMPLETED (CONTINUED)**

<b><u>Year</u></b>	<b><u>Course Title</u></b>
2014	2014-2015 National USPAP Update Michigan Agency Law
2015	Rural Sales Analysis and Confirmation Understanding and Using Comparable Transactions Introduction to Statistical Analysis for Appraisers Valuation of Confined Animal Feeding Operations 7 Hour National USPAP Course
2016	Michigan Law Update Appraising Natural Resources Personalities of Agriculture and Business ASFMRA 87 <sup>th</sup> Annual Convention Rapid Fire Case Studies
2017	The Valuation of Partial Acquisitions, C-421
2017	Report Writing

## MARK A. WILLIAMS

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### **AREAS OF SPECIALIZATION**

Area Wide Market Analysis	Orchards
Christmas Tree Farms	Partial Interest
Cluster Developments	Partial Takings
Commercial Buildings	Poultry Facilities
Conservation Easements	Recreational Ag Properties
Commercial Properties	Residential
CRP Interests	Rural Residential Properties
Dairy Production Facilities	Riding Arenas
Development Properties	Merchantable Timber/High Quality Veneer Parcels
Estate Properties	Single Family Houses
Expert Witness/Agricultural Issues	Subdivision Analysis
Hog Confinement Facilities	Vacant Land
Industrial Projects	Vegetable Farms
Multi-Family Developments	

### **FOR WHOM HE COMPLETED APPRAISAL AND/OR CONSULTING ASSIGNMENTS**

Agricultural Mortgage Company of America	Northstar Bank
American Farmland Mortgage	PNC Bank
American Farmland Trust	Pulte Development Company
Ann Arbor Greenbelt Project	Republic Bank
Eastern Michigan Bank	Ronald Rickard, Attorney
Exchange National Bank	Stephen Rayment, Attorney
Exchange State Bank	Thumb National Bank & Trust
Farm Service Agency	Tri County Bank
Goldstein Orchards	Triple C Development
Grand Traverse Regional Land Conservancy	United States Department of Agriculture
Greenstone Farm Credit	Farmers Home Administration
Hoeksema & Jager Celery Farm	Natural Resources Conservation Services
Leelanau County Conservancy	United States Department of Interior
Little Traverse Conservancy Conservation Trust	Bureau of Indian Affairs
Marquette Bank	National Park Service
Michigan Apple Corporation	Office of the Special Trustee
National City Bank	United States Forest Service
Nexity Bank	

### **MEMBERSHIPS AND AFFILIATIONS**

American Society of Farm Managers and Rural Appraisers	Accredited
American Society of Farm Equipment Appraisers	Member
American Farmland Trust	Member
The Nature Conservancy	Member
Michigan Farm Bureau	Member



## Aspen Appraisals

**Glen Tolksdorf**

**Michigan Registered Forester #548**

**Society of American Foresters Certified Forester #333**

**Michigan Certified General Appraiser #1201001902**

### Experience in appraising gravel and sand deposits

- Since June 2016, appraised three large sand/gravel quarries for lending institution clients
- Worked on the Michigan Soil Survey
- Worked and consulted with Michigan Technological University on soils/wetlands research
- Experienced as a Michigan Registered Forester in sand/gravel removal for woods road construction, which requires estimating the removal and fill of sand/gravel deposits

### Professional Experience

**Tolksdorf Realty & Forestry, and Aspen Appraisals**, Owner/President, 1984 – Present

**Ecoland, LLC**, Co-Owner/Managing Member, 1996 – 2013

**Western U.P. Forest Improvement District**, Region Director, 1989 – 1991

**Forest Restoration, Inc.**, President, 1989 – 1991

**ERA Advantage Realty, Inc. – Houghton**, Co-Owner/Associate Broker, 1987 – 1990

**Mead Paper Corporation**, Forester, 1987

**Michigan Technological University**, Forestry Research Associate, 1983 – 1986, Consultant, 1987

### Professional Affiliations

- Society of American Foresters
- Michigan Association of Timbermen
- Great Lakes Timber Producers Association
- Upper Peninsula Association of Realtors
- Keweenaw Economic Development Alliance

### Licenses & Certifications

- Michigan Registered Forester: #3301000548
- Certified Forester, Society of American Foresters: #333
- American Tree Farm Lead Forest Auditor
- Sustainable Forestry Initiative (SFI) Certified
- Michigan Certified General Appraiser: #1201001902
- Michigan Real Estate Broker: #6501224909

### Education

**Michigan Technological University**

- Bachelor of Science, Forestry, 1985
- Associate in Applied Science, Forest Technology, 1982

### Volunteer and Board Activities

- Michigan Association of Timbermen Board of Directors, 2014-Present
- Houghton – Keweenaw County Recreation Authority Trails Committee, 2013-2014
- Keweenaw Chamber of Commerce, Board of Directors 2012-2013, President, 2014
- Upper Peninsula Finnish American Chamber of Commerce, Vice President, 2014



## **Gary C. Pavlis, Ph.D.**

Rutgers Cooperative Extension Office  
6260 Old Harding Highway  
Mays Landing, NJ 08330  
Telephone: (609)625-0056

Dr. Pavlis has been a professor and agricultural agent at Rutgers University for 28 years. His areas of expertise are blueberry and grape/wine production. His blueberry newsletter, 'The Blueberry Bulletin', has an international following. His research on blueberry fertilization has transformed the New Jersey industry. He has been instrumental in the expansion of the New Jersey wine industry by assisting would be grape growers through the production/marketing mine field. He has served nationally on the board of directors on the American Wine Society. Dr. Pavlis writes a wine article in *edible jersey* called Liquid Assets, regularly appears in print, , on the radio and television educating the public on the intricacies of growing blueberries and grapes in New Jersey or touting the benefits of eating blueberries and drinking wine.

### **Education**

Ph.D. Rutgers University 1985 – Plant Physiology  
M.S. University of Arkansas 1981 – Plant Breeding  
B.S. Rutgers University 1973 – Environmental Science

### **Professional Experience**

Professor - Rutgers University, Ph.D. in Plant Physiology, responsibility for blueberry, grape and small fruit education in NJ.  
Guest speaker throughout the US. on blueberry culture, blueberry fertilization, viticulture research, vineyard establishment, variety selection.  
Conducts research on blueberry fertilization, fungal control in grapes, organic disease control in grapes and blueberries.  
Editor of the 'Blueberry Bulletin' a weekly newsletter with grower subscribers in 37 states and 21 countries.  
Chairs and conducts the NJ Wine Competition annually.  
Chairs and conducts the PA Wine competition annually.  
Teaches an undergraduate wine course at Rutgers University-Spring and Fall Semesters, 200 students/yr. #1 most requested course at Rutgers.

### **Professional Activity Involvement**

1996 American Wine Society Board of Directors Secretary.  
1997 American Wine Society Board of Directors Vice-President.  
1998 American Wine Society Board of Directors President.

2003 American Wine Society Board of Directors Director-At-Large  
Chair of the South Jersey Wine Friends chapter of the American Wine Society.

Taste Vin member of the Dionysian Society, International.

President of “The Wine Docs” Promotional Wine Consultants, a teaching and wine education company.

Member of the Society of Wine Educators.

**Publications And Media Productions**

Television -Numerous interviews on CNN, Philadelphia Channel 6, Atlantic City Channel 40 and guest speaker on the special, If Plants Could Talk on PBS.

Radio - Hosted and interviewed on dozens of radio Talk Shows

Newspapers - regularly quoted in The Atlantic City Press, Asbury Park Press, The Bergen Record, The New York Times, The Philadelphia Inquirer, and the Trenton Times.

News Columns - The Atlantic County Sun Wine Column – weekly in 2003, Associate Editor-Viticulture, Journal of the American Wine Society.

Magazines – Quarterly wine column in ‘edible Jersey’. Written many articles on blueberries and wine for trade journals such as the American Fruit Grower, New Jersey Farmer, Vineyard and Winery Management, Organic Fruit Grower and Wine East.

Books – co-author of the just released book, “Blueberries”.

**Curriculum Vitae  
Tommy D. Overton, Jr.**

**Summary**

Attorney with engineering, commercial, investment banking, and legal experience that reaches across upstream, transportation, refining, and distribution assets. Strong pipeline design, project management, and regulatory compliance background. Proven initiator, strategic thinker, and negotiator of commercial and vendor contracts. Successful real estate entrepreneur and recipient of numerous corporate and scholarly awards with effective leadership, analytical, organizational, and communication skills.

**Professional Experience**

**The Overton Law Firm, P.C., A Professional Law Corporation**

**Private Practice, Houston Texas (1/1/05 – Present)**

Engaged in the general practice of law, primarily in Estate Planning and Probate Matters, Taxation, Real Estate, and Intellectual Property.

**Tommy D. Overton, Jr., P.E.**

**Private Practice, Houston Texas (1/1/05 – Present)**

Onshore and Offshore pipeline consulting and expert witness services.

**Representative Matters:**

Cause No. 2015-36948 *Edgen Murray Corporation v. Northwest Pipe Company*, in the 281<sup>st</sup> Judicial District Court of Harris County, Texas and related litigation in the Western District of Kentucky styled *Southern Star Central Gas Pipeline, Inc. v. Edgen Murray Corporation*; retained by Jones Walker LLP on behalf of Edgen Murray Corporation to provide testimony with regard to pipe manufacturing, specifications, testing, failures, and settling indemnitee's potential liability to claimant and that a settlement was reasonable, prudent, and made in good faith under the circumstances.

*Harry Albert Cicero Sr., et al., v. Acadian Gas Pipeline System*, in private arbitration before a panel of M. Taylor Darden of Carver, Darden, Koretzky, Tessier, Finn, Blossman & Areaux LLC, John Y. Pearce of Montgomery Barnett, L.L.P., and Kirk A. Patrick, III of Donohue, Patrick & Scott PLLC; retained by Liskow & Lewis on behalf of Acadian Gas Pipeline System; provided a report and testimony with regard to pipeline and oil and gas industry terms and meaning, contract terms, safety, design, construction, and blowdown valves on a 30-inch lateral pipeline and mainline blowdown valves on the 36-inch Acadian Haynesville Extension natural gas pipeline.

*Kevin and Patricia May v. Thomas H. Miller, et al.*, 14th Judicial District Court, Parish of Calcasieu, No. 2001-842, Division "A" the Honorable Kent Savoie, Presiding Judge, retained by Trinchard and Trinchard, LLC on behalf of Concha Chemical Company LLC a subsidiary

of Shell Oil Company prepared reports and testified concerning the safety of a highway crossing a 12-inch ethylene pipeline in Calcasieu parish.

*H. T. Bourgeois v. Louisiana State Gas Corporation*, 40th Judicial District Court, Parish of St. John the Baptist, No. 24715, Division “A,” the Honorable Madeline Jasmine, Presiding Judge, retained by Liskow & Lewis on behalf of Acadian Pipeline System a subsidiary of Enterprise Products Partners and testified with regard to the safety, design, maintenance, construction, and operations of a natural gas pipeline in St. John the Baptist Parish.

*Ruth M. LaFoy, et al. v. McAbee Construction, Inc., et al.*, in the Circuit Court of Tuscaloosa County, Alabama, No. 63-Cv-2008-000221.00, the Honorable John H. England, Jr., Presiding Judge, retained by Spain & Gillon, LLC on behalf of CDX Gas, L.L.C. and testified with regard to contract terms, safety, design, construction methods, pressure testing with nitrogen, failure and forensics analysis, and cause of death.

#### **Shell Pipeline Company LP, Houston, Texas**

##### **Commercial and Legal Advisor – Special Assignment (5/03 – 12/31/04)**

Advisor and business liaison with Corporate Legal. Filed comments on Minerals Management Service proposed rule-making and successfully drafted, negotiated, and closed third party tie-in agreements, technology and patent licenses, as well as dedication and transportation agreements, construction and tie-in agreements, joint tariff agreements, and leases associated with Tahiti, a \$75MM deepwater crude oil pipeline. Through legal and economic evaluation, proved a new litigation strategy for a Federal Energy Regulatory Commission (FERC) market based rate case to senior management saving \$2MM and facilitating divestiture of major assets; also drafted motions, discovery requests, and responses with outside counsel.

Responsible for developing security standards and regulatory compliance plans for all pipeline and storage terminals in the United States. Managed a self-organized team of industry professionals, affiliates, regulators, and corporate security personnel. Amidst strong opposition, saved the company more than 60%, or \$12MM, of the required funding for a \$20MM, five-year plan by persuading senior management to apply for federal grants, file FERC tariff surcharges, and re-negotiate contracts. Maintained technical support role and Corporate Secretary duties.

#### **Equilon Pipeline Company LLC, Houston, Texas**

##### **Sr. Business Associate – Business Services (11/99 – 5/03)**

Governance responsibilities included preparing pre-read documents and presenting budgets, resolutions, and major projects to the Board of Directors. Nominated by the President to Corporate Secretary for the Company’s five largest offshore joint venture entities, including: stock companies, limited liability companies, partnerships, and undivided interests. Prepared meeting materials, drafted and maintained minutes, certificates, and other instruments.

Transactional responsibilities included preparing pipeline corridor strategies, economic analysis, hydraulics, market evaluations, forecasts, and coordinating the NEPA permitting process for major projects. Drafted and negotiated commercial proposals, term sheets, and definitive agreements and structured joint interests projects.

Representative development projects: Aspen, a \$250MM joint venture with Williams Energy to transport refined fuels from the Gulf Coast to central Utah; Seahawk, a \$300MM offshore port to offload crude oil tankers in the Gulf of Mexico; Magnolia, a \$40MM deepwater pipeline; and shareholder representative for the \$305MM Expansion of Colonial Pipeline.

**Shell Capital Incorporated, Houston, Texas**

**Business Associate – Structured Finance (6/98 – 11/99)**

Identified investment banking opportunities and developed corresponding financial products for both the gas and power as well as exploration and production business lines. Prepared presentations, structures, and financial models while developing a new client base. Worked in deal teams to review project financing, develop deal pricing, analyze structures, and arrange credit facilities for business lines. Negotiated agreements and completed due diligence in third party transactions.

**Shell Oil Products Company, Houston, Texas**

**Project Engineer – Offshore Marine Group (6/96 – 6/98)**

Designed and constructed offshore oil and gas pipelines and related facilities totaling \$45MM. Responsible for emergency response duties and associated repairs in the Gulf of Mexico. Managed a 12 person staff and established an impeccable record for completing projects on schedule and under budget; acquired a strong reputation for technical proficiency and effective contract negotiations. Duties included matching upstream business objectives and development plans of exploration and production customers with downstream transportation systems for optimum net back, developing deepwater designs, providing sub-sea flow assurance, permitting, and commissioning. Assisted Shell Exploration and Production Company with a construction strategy, budget controls, and scheduling systems for projects in the Gulf of Mexico.

**Transportation Engineer – Operations and Project Support (7/94 – 6/96)**

Provided technical support to the offshore business development and operations departments. Negotiated third party connection agreements; developed multi-year integrity management plans for gas pipelines and prepared lines for intelligent pigging; monitored operational reliability and improved efficiency and asset utilization. Completed offshore pipeline, crude oil trucking, shallow water barge loading, and storage terminal projects. Participated in development of capital and special maintenance budgets.

**Shell Pipe Line Corporation, Houston, Texas**

**Associate Engineer – Environmental and Technical (2/93 – 7/94)**

Technical focal point providing support for pipelines and distribution terminals across a seven-state region. Developed rationale for long-term operating plans and business development for the Mid-Continent Crude and Products Area consistent with refining, crude supply, and product demand forecasts; identified business development needs and opportunities. Prepared and implemented system maintenance plans with budgets. In addition to prescribed responsibilities, independently initiated an electrical engineering project to install Allen Bradley PLC's and remote tank level alarms, modified refinery blending unit to increase capacity, and worked with refinery personnel to remove constraints from the hydrotreater for improved distillates sales.

**Shell Pipe Line Corporation, Indianapolis, Indiana**

**Engineer – Technical Support to Operations (12/89 – 2/93)**

Mechanical, hydraulic, electrical, and operations and project support on crude oil, refined products, and natural gas liquids pipelines in a seven-state region. Completed engineering evaluations of highway and rail crossings, removed shorted casings, re-routed pipelines, replaced pipe at crossings, and removed casing where appropriate. Evaluated blasting plans and negotiated agreements with landowners. Organized depth surveys, developed multi-year line lowering plans, and lowered more than 10 miles of large diameter in-service crude oil lines. Evaluated the efficiency of crude and products distribution terminals and, where appropriate, cleaned and resealed floors in tanks, repaired floating roofs, and replaced tank seals. Consulted and guided field craft groups to refurbish mainline pumping units, installed rectifiers and ground beds, pumped casings with wax, and replaced in-service mainline valves.

**Barnard & Burk Engineers & Constructors, Inc.**

**Junior Engineer, Civil Department (5/89-12/89)**

Conducted field surveys and designed and completed drawings for structural steel and piping for industrial manufacturing complexes.

**Trade Construction Company, Inc.**

**Pipe Fitter (5/84-8/86)**

Reviewed construction and shop drawings, fabricated, installed, tested, and prepared industrial and pipeline projects for commissioning.

**Awards and Accomplishments**

- Special Recognition Awards for:
  - obtaining federal security grants in a larger amount than any other Shell business;
  - responding successfully to FERC tariff surcharge protests;
  - re-negotiating supply contracts to pay for current security costs;
  - closing the \$40MM Magnolia project with Ocean Energy Inc. and Conoco Inc.;
  - identifying and closing on business consulting strategies;
  - providing technical support and seminars on technical and commercial issues; and
  - recruiting special talent.
- Special Award for jointly developing and implementing a budget and schedule control system for the Gulf of Mexico with exploration and production.
- Shell Oil Company President's Quality Leadership Award for developing a commercial project to expand jet fuel sales in St. Louis.
- Successfully developed commercial and residential real estate Limited Liability Companies.

### **Education**

***University of Houston Law Center, Doctor of Jurisprudence***, December 2002      **GPA: 2.90**

- **Journal:** Managing Editor, HOUSTON BUSINESS AND TAX LAW JOURNAL
- **Awards & Recognitions:** Chamberlain, Hrdlicka, White, Williams, and Martin – Distinguished Paper in Taxation; Ebrieffcase profile highlighting charitable contributions to the Law Center
- **Publications:** The Treatment of Cancellation of Indebtedness Income of Insolvent S Corporations, see Houston Business and Tax Law Journal Vol. II; Learning to Like Like-Kind Exchanges, see Abode Magazine April 2002
- **Notable:** Maintained full-time employment; advanced in Moot Court, Negotiation, and Mediation Competitions

***Louisiana State University, Bachelor of Science, Civil Engineering***, 1989      **GPA: 3.368**

GPA (Major): 3.500; Rank (College of Engineering): 13 of 110; Rank (Major): 1 of 8

- **Honors & Inductions:** Dean's list; Tau Beta Pi; Chi Epsilon

### **Licenses and Affiliations**

State Bar of Louisiana, admitted 2005

State Bar of Texas, admitted 2003

United States Patent and Trademark Office, Patent Attorney, admitted 2003



**CV: Richard D. Huriaux, P.E.**

1414 Light Street  
Baltimore, MD 21230-4515  
Tel/Cell: 443-682-0091 Fax: 443-817-0487  
e-mail: [richard.huriaux@comcast.net](mailto:richard.huriaux@comcast.net)

**RECENT PROFESSIONAL EXPERIENCE**

**Richard D. Huriaux, P.E. LLC**

Baltimore, MD

Consulting Engineer – Pipeline Safety, Regulation, and Technology (2008 - Present)

- work with manufacturers to introduce new technologies and products into the regulated pipeline market
- support pipeline operators to ensure compliance with federal and state pipeline safety regulations and technical standards
- provide expert testimony on pipeline safety and regulatory compliance issues

**U.S. Department of Transportation**

**Pipeline and Hazardous Materials Safety Administration (PHMSA)**

**Office of Pipeline Safety (OPS)**

Washington, DC

Director, Pipeline Technical Standards (2006 - 2008)

Director, Pipeline Regulations & Technical Standards (1995 - 2006)

**Public Service Commission of the District of Columbia (DC PSC)**

Washington, DC

Chief Engineer & Director, Office of Engineering (1988 - 1995)

Executive Director for Regulatory Matters (1993 - 1995)

**OTHER PROFESSIONAL EXPERIENCE**

**Bethesda Research Institute, Ltd.**

Rockville, Maryland

Sr. Project Engineer – Utility Engineering Consulting (1985 - 1988)

**Federal Communications Commission**

Washington, DC

Sr. Engineer – Telecommunications Engineering (1982 - 1985)

**Federal Energy Regulatory Commission**

Washington, DC

Sr. Engineer – Gas & Oil Pipeline Analytical Studies (1978 - 1982)

**Interstate Commerce Commission**

Washington, DC

Engineer – Oil Pipeline & Railroad Analysis (1974 - 1978)

## **Bechtel Corporation**

Washington, DC

Resident Engineer – METRO subway construction (1972 - 1974)

## **Rummel, Klepper & Kahl Consulting Engineers**

Baltimore, Maryland – Construction Manager (subways & bridges) (1970 - 1972)

## **MILITARY SERVICE**

### **U.S. Army Security Agency**

Arlington, Virginia (1966 – 1970)

## **OTHER ACTIVITIES**

- Testified before the U.S. Congress, state commissions, and local legislative bodies on gas and electric utility issues and legislation.
- Made numerous presentations/speeches before utility industry organizations.
- Presented annual keynote addresses to the Maryland-DC Utilities Association.
- Coauthor, *Gas Transmission and Piping Systems* (ASME Code B31.8-2014)
- Coauthor, *Guide for Gas Transmission, Distribution, and Gathering Piping* (ANSI Z380.1)

## **PROFESSIONAL REGISTRATIONS AND MEMBERSHIPS**

Registered Professional Engineer (P.E.) MD #1771

Member	American Society of Civil Engineers (ASCE)
Member	American Society of Mechanical Engineers (ASME)
Member	American Society for Testing and Materials (ASTM)
Member	ASTM Committee F17 (plastic piping)
Member	ASME B31.8, Gas Transmission and Distribution Piping Systems
Member	ANSI Z380.1, Gas Piping Technology Committee (GPTC)
Former Director	ASME Standards and Certification Board of Directors
Former Director	ASME Council on Codes and Standards
Former Member	ASME Board on Hearings and Appeals
Former Secretary	Gas Pipeline Safety Research Committee (GPSRC)
Former Chair	National Association of Pipeline Safety Representatives (NAPSR)
Former Chair	Pipeline Standards Organizations Coordinating Committee (PSDOCC)
Former Member	US Technical Advisory Group, ISO/TC 67/SC2, the international gas pipeline standards committee
Former Member	API Standard 1104, Joint Welding Committee
Former Member	U.S. Department of Transportation Safety Council

## **EDUCATION**

BSCE University of Maryland, College Park, MD  
MSME George Washington University, Washington, DC

## **Mike Israni** **Inamco Engineering, LLC**

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Mike Israni recently retired as Senior Technical Advisor & Manager – Regulations and Standards, in the Pipeline and Hazardous Materials Safety Administration (PHMSA) of the U.S. Department of Transportation (DOT). Presently, he consults in the safe operations and maintenance activities of gas and petroleum pipeline industry.

**1994-2016:** Mike served as *Senior Technical Advisor and Manager* on natural gas and hazardous liquid pipeline systems and storage facilities, offshore pipelines, liquefied natural gas (LNG) and liquefied petroleum gas (LPG) facilities. Mike led the teams responsible for the development and implementation of risk-based regulations, integrity management program, and integrity verification process and safety management systems. Mike was responsible for the development of major regulations on natural gas and hazardous liquid pipelines since 1994. Mike also served as PHMSA host to foreign delegations to share and learn knowledge in the gas and petroleum pipeline safe operation and maintenance activities.

Mike advised PHMSA's senior executives on national consensus standards and technical issues. He planned, developed and maintained the federal relationship with the Pipeline and Tank standard developing organizations, and ensured that appropriate standards are developed and incorporated in the pipeline and storage tanks regulations. He represented DOT on Pipeline Standards Developing Organizations Coordinating Council (PSDOCC), ASME B31.8 (gas pipeline) and B31.8S (Gas integrity) committees, API 1160 (Liquid integrity), NFPA 58 (Propane), NFPA 59 (LPG Utility) and NFPA 59A (LNG) committees.

**1985-1994:** Mike served as *Chief of Marine Engineering Branch* at the United States Coast Guard (USCG). As Chief Engineer he was responsible for safety regulations and standards for machinery and pipeline for US ships and marine industry. Mike also represented USA at the International Maritime Organization (IMO) on Marine Safety- machinery and piping systems.

**In 1993,** Mike passed the National Board Examination for Authorized Inspectors for pipeline and pressure vessels (ASME/NBBI) and was assigned to ASME's Accreditation Committee to evaluate the performance of Inspectors for the pipeline, pressure vessels, boilers, heat exchangers, NDT and Welding.

**1979-1985:** Mike worked as *Senior Engineer at Avondale Industries* in New Orleans, in the marine pipeline and storage tank design, construction, testing, operation, and maintenance.

**1970-1977:** Mike worked as *Chief Engineer on Merchant Ships* responsible for operation and maintenance. Mike received Chief Engineer's License for Merchant Ships in 1976.

**In 1978,** Mike received *Master's degree in Naval Architecture and Marine Engineering* at the University of Michigan, Ann Arbor, MI.

**In 1970,** he received *Bachelor's degree in Mechanical Engineering* from the University of Bombay, India.

e-mail: [mikeisrani@yahoo.com](mailto:mikeisrani@yahoo.com) ; <http://www.inamcoengineering.com/home/>

(408) 332-2121 (mobile) (925)999-9690 (Landline)